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March 27, 2015

VIA ECF (and courtesy copy by email)

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: XL Specialty Ins. Co. v. John Lakian, et al., 14-CV-5225(AT)

Dear Judge Torres:

We write on behalf of our client, Kobre & Kim LLP, to join in Defendants John R. Lakian and Diane W. Lamm's opposition to the pre-motion letter filed by Knox, LLC d/b/a Knox, LLC of New York ("Knox") and DJW Advisors, LLC ("DJW").

We write separately to note the substantial prejudice Kobre & Kim LLP would suffer in the event that the stay sought by Knox and DJW were granted. As is clear from documents already submitted to the Court, Kobre & Kim LLP is – and has been for almost two years – owed more than US \$1 million for legal services it provided to Diane Lamm. Kobre & Kim LLP has agreed to a substantial discount on the fees it is owed in order to resolve this matter via settlement and receive its money now. Forcing it to wait an indeterminate additional amount of time to receive its money is, under the circumstances, unfair and would result in substantial prejudice.

Thus, because of the prejudice that Kobre & Kim LLP will suffer if Knox and DJW are granted a stay and for the reasons articulated by Mr. Lakian and Ms. Lamm in their letter, we respectfully request that this Court deny Knox and DJW's request to file a motion for a stay.

Sincerely,



Edward J. Stein

EJS:mf

cc: Counsel of Record (via ECF and email)

New York, NY ■ Ventura, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA ■ Dallas, TX

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